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February 28, 2025

VIA ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Naquan Cintron v. City of New York, et al., 24-cv-06602 (PAE)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant City of New York in this matter. Defendant writes in response to plaintiff's letter, dated February 27, 2025. See ECF No. 14. Defendant agrees that the motion is now moot, as plaintiff has provided the required release. However, plaintiff's letter makes it appear as if defendants did not make proper requests for the required release. Defendant has been seeking this release for over two months, without progress. Defendant notes that the undersigned wrote to counsel for plaintiff on December 19, 2024, as is required by Local Rule 83.10, and plaintiff's attorney confirmed in writing that that a 160.50 release would be provided "ASAP." The undersigned followed up in writing on January 3, 2025, January 28, 2025, and February 7, 2025, without any response. Plaintiff did not provide the required releases in response to defendant's numerous requests, and it appears that plaintiff only provided the releases upon receipt of defendant's filed motion. Plaintiff only provided a release after Defendant filed a letter with the Court, and shortly before the Court's Order on February 25, 2025, over two months after counsel stated it would be provided "ASAP." See ECF No. 13.

Thank you for your consideration herein.

Respectfully submitted,

/s/

John Schemitsch
Senior Counsel

cc: **VIA ECF**
All Counsel of Record